

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)	CASE NO. 8:03CR277
	)	
Plaintiff,	)	
	)	
v.	)	<b>MOTION TO AMEND SPECIAL</b>
	)	<b>CONDITIONS OF SUPERVISION</b>
SHAWN QUINN,	)	
	)	
Defendant.	)	

The Defendant, Shawn Quinn, by and through his attorney, Shannon P. O'Connor, requests the Court amend the Special Conditions of Supervision by amending paragraph 3 which states as follows:

3. The Defendant shall have no contact, nor reside with children under the age of 18, including their own children, unless approved in advance and in writing by the probation officer in consultation with the treatment providers. The Defendant must report all incidental contact with children to the probation officer and the treatment provider.

Mr. Quinn has three young sons, 6 years old, 5 years old, and 3 years old, who are currently in their mother's custody. Both parents desire that the Defendant not only have contact with his sons, but will also have a period of time when they reside with him. This condition will prevent him from taking care of his children, including taking them to school and other locations and events with children in the same age group.

There is no evidence in this case or otherwise that the Defendant is in any way a danger to his sons. Reunification with father and sons is vitally important to the children.

Instead, the Defendant requests the language in paragraph 3 be replaced with the following:

The defendant shall not reside with children under the age of 18, except his own children, unless approved in advance and

in writing by the probation officer in consultation with the treatment providers.

Counsel has spoken with supervising probation officer Drew Cromwell who agrees that the Defendant should have contact with his sons including their temporary residence with him. Mr. Cromwell has no objection to the Defendant's motion. Defense counsel has also spoken with Assistant U.S. Attorney Michael Norris who also has no objection to the motion.

WHEREFORE, the Defendant requests the Court amend Special Conditions of Supervision imposed on April 14, 2004 by deleting paragraph 3. The defense can present evidence should the Court so desire.

SHAWN QUINN, Defendant,

By: s/ Shannon P. O'Connor  
**SHANNON P. O'CONNOR**  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: Michael Norris, Assistant United States Attorney, Omaha, NE.

I also certify that a true and correct copy was served via interoffice mail on Drew Cromwell at the United States Probation Office, 111 South 18th Plaza, #C79, Omaha, NE on October 13, 2005.

s/ Shannon P. O'Connor